



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

John Schemitsch
Senior Counsel
Desk: 212-356-3539
jschemit@law.nyc.gov

September 27, 2023

BY ECF

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Nunez, et al. v. City of New York et al.*, 11-cv-5845 (LTS)

Dear Chief Judge Swain:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel for the City of New York (the “City”), assigned to represent the City and the Department of Correction in this matter. I write to respectfully request that the Court enter the attached proposed Protective Order Concerning Attorneys’-Eyes-Only Information. For the reasons set forth in the proposed Order, it is needed to facilitate the rapid sharing of documents and information with the plaintiffs while preserving confidentiality until any differences between the parties on that issue can be resolved. Plaintiffs consent to the entry of this Order.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

John Schemitsch

cc: BY ECF
All counsel of record